## UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD

NBC Universal, Inc.,	: NLRB Case No. 2-UC-625 <i>et als</i> : :
and	<b>:</b> :
NABET-CWA, AFL-CIO,	:
Petitioner.	: :

## Petitioner's Response to Employer's Extension Request

The National Association of Broadcast Employees and Technicians – Communications Workers of America, AFL-CIO ("NABET-CWA") hereby files this brief response to NBC Universal's request for an eight-week extension of time in which to file its Request for Review. NABET-CWA strenuously opposes such a lengthy, additional delay in this proceeding. However, due to the circumstances, NABET-CWA does not object to a two-week extension for the Employer, which would double the time the Employer has to prepare and file its request pursuant to NLRB Rules and Regulations §102.67(b), so long as the Petitioner is granted an additional one-week period of time in which to prepare and file its response.

NABET-CWA Locals 11, 31, 41 and 53 filed their unit clarification petitions in February and March 2009, nearly three years ago. Dozens of NABET-CWA members were unilaterally removed from the bargaining unit, and had their terms and conditions of employment altered, when the Employer implemented the Content Centers in 2009. This matter must be resolved with finality forthwith. Any further delay is simply untenable. Thus, the Employer's request for an eight-week extension should be denied. Thank you.

Respectfully submitted,

Judiann Chartier NABET-CWA Sector Counsel

NABET-CWA, AFL-CIO 501 Third Street NW, 6<sup>th</sup> Floor Washington, DC 20001 (202) 434-1234

## Certification of Service

I hereby certify that on this day I electronically filed a copy of NABET-CWA's response to the Employer's Extension Request with the Office of the Executive Secretary electronically. I further certify that a copy of the same has been served via electronic mail upon:

Michael Curley, Esq. (MCurley@curleyhessinger.com)
Anee Raulerson, Esq. (araulers@aftra.com)
Brian Powers, Esq. (bpowers@odonoghuelaw.com)
Barry Peek, Esq. (bpeek@msek.com)
Ralph Phillips, Esq. (rmp@wkpyc.com)
Elbert Tellum, Acting Regional Director (Elbert.Tellum@nlrb.gov)

Dated: November 2, 2011

Judiann Chartier